

Docket No.: 101-1030
Serial No. 10/822,002
Amdt. Dated January 12, 2006
Reply to Office Action of November 22, 2005

Amendments to the Drawings:

The attached sheet of drawing includes changes to Fig. 16. This sheet, which includes Fig. 16, replaces the original sheet including Fig. 16.

Attachment: Replacement Sheet

Docket No.: 101-1030
Serial No. 10/822,002
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REMARKS

Introduction

Upon entry of the foregoing amendment, claims 1, 2, 4-17, and 19-28 are pending in the application. By this Amendment, claims 3 and 18 are canceled; claims 1 and 15 are amended to incorporate the allowable subject matter of canceled claims 3 and 18, respectively; claims 4, 5, 8, 9, 12, 17, 20, and 23-25 are amended for clarification; and claim 28 is added. No new matter is being presented. In view of the following remarks, reconsideration and allowance of all the pending claims are requested.

Applicants note with appreciation the indication in the Office Action that each of the references cited in the Information Disclosure Statement of January 24, 2005 have been considered.

In addition, Applicants would like to point out to the Examiner that U.S. Patent Application Publication No. 2004/0096240 to Kim, cited in the 35 U.S.C. §103(a) rejection, is only available as prior art under 35 U.S.C. §102(e). However, the subject matter of this reference and the claims of the instant application were commonly-owned by Samsung Electronics Co., Ltd. at the time the claimed invention was made. Accordingly, under 35 U.S.C. §103(c), this reference is disqualified as prior art for the purpose of a 35 U.S.C. §103(a) rejection.

Allowable Subject Matter

Applicants appreciate the indication in the Office Action that claims 6-14, 17, 19-21, and 24-27 contain allowable subject matter.

New Claim

New claim 28 is added by this Amendment. New claim 28 recites, *inter alia*, a second door, an opening switch, and a door locking unit, which are allowable subject matter. Accordingly, it is respectfully submitted that new claim 28 does not present new matter, and claim 28 is allowable over the prior art of record. Support for new claim 28 can be found at least in original claims 1 and 10. Allowance of new claim 28 is earnestly solicited.

Docket No.: 101-1030
Serial No. 10/822,002
Amdt. Dated January 12, 2006
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Drawings Objection

The Office Action objects to Fig. 16 due to a typographical error in one of the reference numbers. By this Amendment, Fig. 16 is amended to correct this error. Reconsideration and withdrawal of the objection are respectfully requested.

Specification Objection

The Office Action objects to the specification for various informalities. By this Amendment, the specification is amended to address various informalities, including those identified by the Office Action. Reconsideration and withdrawal of the objection are respectfully requested.

Claims Objection

The Office Action objects to claims 8 and 12-26 for various informalities. In particular, claims 8, 12, 15, and 24 are objected to for various grammatical errors, and claims 13, 14, 16-23, 25, and 26 are objected to for depending from claims 8, 12, 15, or 24. By this Amendment, claim 18 is canceled and claims 8, 12, 15, and 24 are amended as suggested by the Office Action. Reconsideration and withdrawal of the rejection are respectfully requested.

Rejection under 35 USC §102(b)

The office Action rejects claims 1, 15, 16, 22, and 23 under 35 U.S.C. §102(b) as being anticipated by Yamamoto (U.S. Patent No. 6,501,925). Applicants respectfully traverse this rejection for at least the following reasons.

Claim 3 is not rejected over Yamamoto, and thus is not anticipated by Yamamoto. Furthermore, the Examiner stated on the third paragraph of item 3 on page 5 of the Office Action that Yamamoto differs from the claims because Yamamoto does not disclose a retracting unit, as recited in claim 3. By this Amendment, claim 1 is amended to incorporate the subject matter of claim 3. Accordingly, claim 1 is not anticipated by Yamamoto for at least the same reasons as claim 3.

Claim 18 is not rejected over Yamamoto, and thus is not anticipated Yamamoto. As discussed above, the Examiner stated on the third paragraph of item 3 on page 5 of the Office

Docket No.: 101-1030
Serial No. 10/822,002
Amdt. Dated January 12, 2006
Reply to Office Action of November 22, 2005

Action that Yamamoto differs from the claims because Yamamoto does not disclose a retreat unit, as recited in claim 18. By this Amendment, claim 15 is amended to incorporate the subject matter of claim 18. Accordingly, claim 15 is not anticipated over Yamamoto for at least the same reasons as claim 18. Claims 16, 22, and 23 depend from claim 15 and include all of its limitations. Accordingly, these dependent claims not anticipated by Yamamoto for at least the same reasons as claim 15.

For at least the reasons discussed above, Yamamoto fails to anticipate claims 1, 15, 16, 22, and 23. Accordingly, these claims are patentable over Yamamoto. Reconsideration and withdrawal of the rejection are respectfully requested.

Rejection under 35 USC §103

The Office Action rejects claims 2-5 and 18 under 35 U.S.C. §103(a) as being obvious over Yamamoto in view of Kim (U.S. Patent Application Publication No. 2004/0096240). Claims 3 and 18 are canceled, rendering the rejection of these claims moot. Applicants respectfully traverse the rejection of claims 2, 4, and 5 for at least the following reasons.

Claims 1, 15, and Yamamoto are discussed above. For the reasons discussed above, claims 1 and 15 are patentable over Yamamoto. Specifically, claim 1 is patentable over Yamamoto, because Yamamoto at least fails to teach or suggest "an electrophotographic printer comprising ... a retracting unit to retreat at least one of the development units being positioned above a center of the photosensitive drum in association with an opening operation of the first door to a position at which the development unit does not interfere with the photosensitive drum when the photosensitive drum unit is mounted or dismounted in a vertical direction," as required by claim 1. Furthermore, claim 15 is patentable over Yamamoto, because Yamamoto fails to teach or suggest "an electrophotographic printer ... comprising a retreat unit to retreat the developing roller from the photosensitive drum unit when the photosensitive drum unit is dismounted from the main frame, to prevent an interference between the photosensitive drum and the at least one development unit," as required by claim 15.

The Office Action admits that Yamamoto fails to teach or suggest the retracting unit of claim 1 and the retreating unit of claim 15. However, the Office Action cites Kim as remedying

Docket No.: 101-1030
Serial No. 10/822,002
Amdt. Dated January 12, 2006
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these deficiencies of Yamamoto. Applicants respectfully disagree, and asserts that Kim also fails to teach or suggest the retracting unit of claim 1 and the retreating unit of claim 15.

As noted by the Office Action, Kim discloses that a spring 200 is typically installed in the disclosed electrophotographic imaging member such that when the door 210 is closed, the developing unit main body 130a is pushed toward the photoreceptor drum 100. See Kim at paragraphs [0025] and [0028]. However, Kim is entirely silent regarding a retracting unit to retreat at least one of the development units (as required by claim 1), and a retreat unit to retreat the developing roller from the photosensitive drum unit when the photosensitive drum unit is dismounted from the main frame (as required by claim 15). Thus, Kim also fails to teach or suggest the retracting unit of claim 1 and the retreating unit of claim 15.

Although Kim's spring 200 pushes the developing unit toward the photoreceptor drum, as discussed above, the spring 200 does not retreat at least one development unit in association with an opening operation of a first door to a position at which the development unit does not interfere with the photosensitive drum when the photosensitive drum unit is mounted or dismounted in a vertical direction. Furthermore, the spring 200 does not retreat a developing roller from a photosensitive drum unit when the photosensitive drum unit is dismounted from a main frame, to prevent an interference between the photosensitive drum and the at least one development unit. Thus, Kim fails to remedy the deficiencies of Yamamoto because Kim also fails to teach or suggest the retracting unit of claim 1 and the retreating unit of claim 15.

The Office Action states that Kim's spring 200 corresponds to the claimed retracting unit without citing any support for that conclusion. The Office Action provides absolutely no evidence that Kim's spring 200 is a retracting unit that retreats "at least one of the development units being positioned above a center of the photosensitive drum in association with an opening operation of the first door to a position at which the development unit does not interfere with the photosensitive drum when the photosensitive drum unit is mounted or dismounted in a vertical direction," as required by claim 1. Furthermore, the Office Action provides no evidence that Kim's spring 200 is a retreat unit that retreats "the developing roller from the photosensitive drum unit when the photosensitive drum unit is dismounted from the main frame, to prevent an interference between the photosensitive drum and the at least one development unit," as required by claim 15.

Docket No.: 101-1030
Serial No. 10/822,002
Amdt. Dated January 12, 2006
Reply to Office Action of November 22, 2005

For at least the reasons discussed above, Yamamoto, alone or in view of Kim, fails to teach or suggest every feature of claims 1 and 15. Specifically, Yamamoto, alone or in view of Kim, fails to teach or suggest the retracting unit of claim 1 and the retreat unit of claim 15. Thus, claims 1 and 15 would not have been obvious over Yamamoto, alone or in view of Kim. Accordingly, claims 1 and 15 are patentable over Yamamoto, alone or in view of Kim. Claims 2, 4, and 5 depend from claim 1 and include all of its features. Accordingly, these dependent claims are patentable over Yamamoto, alone or in view of Kim, for at least the same reasons as claim 1. Reconsideration and withdrawal of the rejection are respectfully requested.

Conclusion

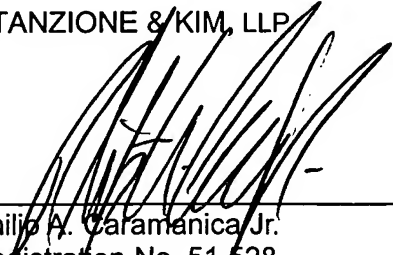
It is respectfully submitted that a full and complete response has been made to the outstanding Office Action and, as such, there being no other objections or rejections, this application is in condition for allowance, and a notice to this effect is earnestly solicited.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided below.

If any further fees are required in connection with the filing of this amendment, please charge the same to our Deposit Account No. 502827.

Respectfully submitted,

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